

From: Bill Jacobs  
To: Jim Barron  
Cc: John Hebert  
Subject: RE: bait station and efficacy protocol questions  
Date: 05/13/2009 01:04 PM  
Attachments: 1-220MacPP.pdf

You can contact John or I. Either way, we'll set up a meeting and invite the OPP folks who we think should be there, based mainly upon the content of your request.

The mouse placepack protocol for acute rodenticides is attached below.



1-220MacPP.pdf

That protocol can be adapted to test the wrapped bait block in the bait station. Such a test essentially would answer the question of whether mice readily would penetrate the new wrapper and also, if wild-type house mice were used as subjects, could indicate whether the bait station's structure or composition is inhibitory to mice in any way. The primary modifications needed to adapt Protocol 1.220 for testing ready-to-use bait stations with house mice involve greatly expanding the size of the testing arena (so that 2 stations can be deployed with label-consistent spacing) and increasing the amount of alternative cover provided (so that mice are not primarily attracted to the stations for the cover that they provide).

Your client might be in contact with Chuck Dickerson. He was involved with development and testing of many of the PM Resources rodenticide products when they were registered to Purina Mills. He retired and moved to Michigan a while back, but he might be useful to them in helping to develop protocols specific to testing this product.

▼ "Jim Barron" ---05/13/2009 10:56:10 AM---Bill, Ok, it sounds like I need to put together a formal meeting request. Meanwhile, for you inform

From: "Jim Barron" <jbarron@exponent.com>  
To: Bill Jacobs/DC/USEPA/US@EPA  
Date: 05/13/2009 10:56 AM  
Subject: RE: bait station and efficacy protocol questions

Bill,

Ok, it sounds like I need to put together a formal meeting request. Meanwhile, for you information, the client is Virbac Animal Health (dba) PM Resources. The existing bait block they are going to come in for a new product in a bait station with for home use is currently registered as 67517-66. They are planning to shrink-wrap the bait block and refills with something different from the place pack paper they currently have registered with their pellets, so there are palatability and efficacy questions to address. We need to see the old mouse place pack efficacy protocol and discuss with you whether or not we can bridge to that, as well as a number of other more general questions. John found for us the old rat protocol for the place pack efficacy study, but the mouse one we still need. If we could see that mouse protocol, it will probably generate questions for our meeting as well.

Should this meeting request be addressed to you or John? I would think we could do this meeting with you, John, and it might be helpful to have Rusty in there, in case there are any questions about the amended labels.

Thanks,

Jim

Jim Barron, Ph. D.  
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-----Original Message-----  
From: Jacobs.Bill@epamail.epa.gov [mailto:Jacobs.Bill@epamail.epa.gov]  
Sent: Wednesday, May 13, 2009 10:37 AM  
To: Jim Barron  
Cc: Hebert.John@epamail.epa.gov  
Subject: Re: bait station and efficacy protocol questions

It's better to clear up as many issues as possible before testing begins.

It might be best to set up a broader meeting which includes the Product Manager responsible for rodenticides as well as others potentially involved in the registration of new products of this type. In addition to your client's questions, please indicate (via e-mail or telephone - 703-305-6406) your client's identity as well as the file symbols and registration numbers of any pending applications or existing registrations that might be relevant to the ready-to-use bait station product that your client seeks to develop.

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| From: |
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| "Jim Barron" |
| <jbarron@exponent.com> |
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| To: |
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| Bill |
| Jacobs/DC/USEPA/US@EPA |
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| Date: |
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|-----|
| 05/13/2009 10:26 |
AM |
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| Subject: |
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|bait station and efficacy protocol  
questions  
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Bill,

My client has a large laundry list of rodenticide questions in your area.  
Can we set up a time to sit down for an hour and go through these questions?

I'll send them to you beforehand.

Thanks a lot,

Jim

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